

VERMONT YANKEE NUCLEAR POWER CORPORATION

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February 14, 2000
BVY 00-15

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

- References:
- (a) Letter, VYNPC to USNRC, "Vermont Yankee's Plans for the 1998 and 1999 Refueling Outages Regarding Reactor Vessel Internals," BVY 97-123, dated September 30, 1997
 - (b) Letter, VYNPC to USNRC, "Reactor Vessel Internal Plans for the 1999 and 2001 Refueling Outages," BVY 99-73, dated May 27, 1999

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Vermont Yankee's Plans for Reactor Vessel Internal Core Spray Piping**

In Reference (a), Vermont Yankee (VY) indicated that we would replace the reactor vessel internal Core Spray (CS) system piping as a preemptive solution to CS piping that may require repair as a result of future scheduled inspections. In Reference (b), VY indicated that the subject CS piping and its associated welds would be replaced during the 2001 refueling outage. Based on positive inspection results, VY has reassessed our plans and decided to continue inspecting the subject piping.

During the 1996, 1998, and the 1999 refueling outages, VY inspected all accessible CS welds in accordance with our commitment to follow the guidance of "BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines (BWRVIP - 18)."

The failure mechanism of concern for reactor vessel internal welds is IGSCC. VY has volumetrically inspected (140) Jet Pump Mixer/Diffuser welds and (30) Jet Pump Riser welds. Visual inspections of the remaining (20) Mixer/Diffuser welds were also performed. These and other reactor vessel internal inspections have demonstrated that while IGSCC does exist at VY, this degradation mechanism has not resulted in significant degradation that would warrant early replacement or repair of reactor vessel components.

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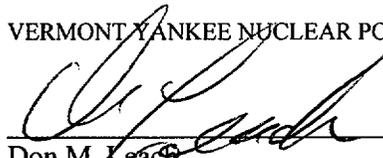
Further, the cost of engineering, fabricating and installing the new piping system was also reassessed. The task of designing a replacement system has proven to be a significantly greater effort than originally anticipated. An assessment was performed on our plans for a preemptive replacement of the piping and it was determined that, until the results of future inspections indicate the development of a more significant degree of degradation, plans for repairs or replacements to the piping will not be pursued.

VY will continue inspection of the CS piping welds in accordance with our commitment to follow the guidance of the Boiling Water Reactor Vessel Internals Program (BWRVIP) documents, and specifically the "BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines (BWRVIP -18)."

We trust that this submittal provides adequate explanation of our revised plans. However, should you have questions or require additional information, please contact Mr. Jim DeVincentis at (802) 258-4236.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Don M. Leach
Vice-President, Engineering

cc: USNRC Region 1 Administrator
USNRC Resident Inspector – VYNPS
USNRC Project Manager – VYNPS
Vermont Department of Public Service

SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: 00-15

The following table identifies commitments made in this document by Vermont Yankee. Any other actions discussed in the submittal represent intended or planned actions by Vermont Yankee. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager of any questions regarding this document or any associated commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"
None	N/A